

1
2
3
4
5
6 **UNITED STATES DISTRICT COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA**
8 **SAN FRANCISCO DIVISION**

9
10 IN RE: FACEBOOK, INC. CONSUMER
11 PRIVACY USER PROFILE LITIGATION,

12 This document relates to:
13 ALL ACTIONS
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF RUSSELL H.
FALCONER IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO TEMPORARILY FILE
UNDER SEAL SPECIAL MASTER'S
ORDER**

1 I, Russell H. Falconer, hereby declare as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Facebook, Inc. ("Facebook") in the above-captioned matter. I am a member in good standing of the
4 State Bar of Texas. I submit this declaration in support of Facebook's Administrative Motion to
5 Temporarily File Under Seal Special Master's Order. I make this declaration on my own knowledge,
6 and I would testify to the matters stated herein under oath if called upon to do so.

7 2. A true and correct unredacted copy of the Special Master's March 22, 2022 Order
8 Following March 9, 2022 Hearing Regarding Plaintiffs' Motion To Compel Production Of Plaintiff
9 Data (the "Order") is attached hereto as Exhibit A.

10 3. I declare under penalty of perjury under the laws of the United States of America that
11 the foregoing is true and correct.

12
13 Executed on March 24, 2022 in Dallas, Texas.

14
15 /s/ Russell H. Falconer
16 Russell H. Falconer
17
18
19
20
21
22
23
24
25
26
27
28